

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2008-196-E- ORDER NO. 2008-756
JANUARY....., 2009

INRE:

Combined Application of South Carolina Electric & Gas Company for a Certificate of Environmental Compatibility and Public Convenience and Necessity and for a Base Load Review Order for the Construction and Operation of a Nuclear Facility in Jenkinsville, South Carolina.

**MEMORANDUM of JOSEPH WOJCICKI
- INTERVENOR
ABOUT MISSING FACTS IN SOME
PROPOSED ORDERS IN THE
LOCATION OF TWO NEW REACTORS
PLANNED BY APPLICANT**

After browsing SCE&G and ORS proposed Orders ("orders"), I could not find a word about Governors' Sanford of SC and Perdue of GA 2007 decision about Jasper Ocean Terminal ("JOT") project that will create the base load (24/7) for electricity with a generated power in the range of GWs in southern boundary of SC, close to Atlantic Ocean and Savannah Port location in the covered perspective of 15 years (till 2024). This information was not delivered to their experts before PSC December 1-17, 2008 hearing, but could be found in my documents entered to the docket before the hearing and at the hearing. ORS uses Governor Sanford's support (ORS_Page 14) to nuclear technology in power generation but ignores his decisions closely related to it.

There are still discrediting "orders" statements, e.g. ORS_ Page 2: "*The AP1000 plants... at the V.C. Summer Nuclear Station ("VCSNS") and will utilize the existing Parr and Monticello Reservoirs.*" Where, in fact they would use water **from the Broad River** for reactors' cooling systems. These reservoirs are only for intermediate water storage. Seawater from the Atlantic is better as a cooling medium and leaves water from the Broad River and other Midlands' reservoirs for people, farmers, and industry if the Atlantic Ocean Location ("AOL") would be used in the project.

ORS_Page 6:

"2. *SCE&G established need for additional base load generation for the years 2016 and 2019.*" In wrong locations of Jenkinsville. There are not even any maps in their Application. It was revealed that planned additional new transmission lines from Jenkinsville to Charleston are for delivery of electric energy for loads close to Atlantic estimated in the Application to be even lower (e.g. without of JOT approved by Governor Sanford). AOL will avoid their construction cost and operational losses.

"3. *SCE&G's decision to proceed with construction of the nuclear plants is prudent and reasonable considering the **information available to the utility.***" No, it is not prudent in Jenkinsville location, according to the information available after March 2007 and about large load locations revealed at the hearing. The lack of panel's knowledge (members were from out of SC and acknowledged lack of that information in their analyses) does

not excuse this statement now. Also analysis done before 2005 is not valid. Extended selection could be valid now only for AOL. Location of Jasper Ocean Terminal ("JOT") was finally accepted in 2007 (before date of Application entered to PSC docket in May 2008). SCE&G has their offices in and close to Jasper County which is in their area of service.

ORS_Page 34:

"SCE&G witness Connor testified that the nuclear site receives environmental regulatory oversight at the federal level by the NRC and at the state level by the S.C. Department of Health and Environmental Control ("DHEC"). (Tr. Vol. 10, Connor at 2415.) A listing of all approvals, permits and authorizations required for preconstruction and construction activity can be found in Tables 1.2-2 and 1.2-3 of the ER. (Tr. Vol. 10, Connor at 2419.) From this Commission, a certificate of environmental compatibility must be granted." NRC is working on EIS and has informed that its scope will be ready in one year and will be returned to the people of SC for another review. Waiting with a new AOL process of selection over one year will harm time schedule of the project. It is illogical to expect approval of Application's VCSNS –Jenkinsville location that requires enormous amount of cooling water from the Broad River when another location on the Atlantic shore will use seawater instead. Please note that there is a very active group of water experts and SC senators in the case of water savings and protection of *inter alia* Broad River water level. They are very active with public support in the present days. Be aware that the AOL is required **primary for proper electric power generating and distributing in SC and SE region.**

ORS_Pages 29-30:

"Water withdrawn for makeup to the circulating water system will be supplied at an approximate rate of 81 cubic feet per second ("cfs") during normal operations. (Tr. Vol. 10, Connor at 2437.)." Here is no added (to estimate total water) water planned to be withdrawn for other reactors. It could be twice the necessary water for cooling or even more if other plants will be installed before water from the Broad River will reach connection to Parr Reservoir.

*"....SCE&G theoretically could operate all three nuclear units for approximately **two and one-half** (2½) months at full capacity, relying only on the resources offered by the Monticello Reservoir..., ". This period of 76 days is no longer valid and there is no information on the necessary preventive time period of shutting down before no water will be available. It must be considered and calculated because, according to SCE&G witnesses, even after shut down, reactors still need water for cooling. Therefore, waiting for the situation when no water would be at intake is not permitted. In 2008, SC reservoirs had many inches or feet of water level below the normal value, probably used to SCE&G estimation. On the other hand, it would be no problem if reactors will be installed at AOL and designed to use the seawater from Atlantic for cooling. In Jenkinsville, located in the SE drought zone (NRC classification), it is a high risk that while reactors are shut down, there will be no electricity and no water at the same time.*

Also, water quality problems, especially for people, animal, and plants will be practically removed from EIS at AOL.

CONCLUSION

_ This Memo is intended to warn everybody not to ignore my indication of a much better location (AOL) than requested by SCE&G site of *VCSNS* in Jenkinsville. If simply reusing now the SCE&G 2005 Selection Criteria, even SRS – Aiken would be a better location because of its shorter (about 120 miles) distance to JOT. AOL is decidedly better, supported by common sense, science, and expertise. None of the witnesses questioned my calculations at the PSC hearing.

_ Any Verdict (“verdict”) which would approve even partially the SCE&G Application MUST be supported by a new selection of the AOL.

_ The Verdict MUST approve electric energy generating units pointed/located on the grid map of the SE regional network topology. Proposed AOL will avoid potentially billions of dollars in transmission lines construction and operational losses.

_ The Verdict MUST consider saving SC Rivers’ water for the public, farmers, industry, and SC environment, and require nuclear units to be designed and installed with seawater cooling systems.

_ **Continuance of ignorance of above facts** will lead to international embarrassment (in other words, it is a possible reaction from professionals, like e.g. “stupid application, the process with stupid results”). Maybe a [Conspiracy to Obstruct Justice via Failure to Investigate](#) will call U.S.C. TITLE 18 > PART I > CHAPTER 1

Respectfully submitted,

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February 3, 2009

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CERTIFICATE OF SERVICE

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